

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO FIRST SET OF REQUESTS FOR ADMISSION FROM
THE MAJOR MAILERS ASSOCIATION

The United States Postal Service hereby provides its response to the first set of requests for admission of the Major Mailers Association, filed on July 27, 2000.

The request is stated verbatim and is followed by the response. Because the request as filed was not numbered, the Postal Service gave it the number "1."

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992 Fax -5402
July 31, 2000

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO REQUESTS FOR ADMISSION FROM MAJOR MAILERS ASSOC.**

1. Please confirm that the FY 1999 updates filed by the Postal Service do not include the following materials and that the Postal Service does not intend to file updates of such materials to reflect the FY 1999 data:

- a. LR-I-131 (Volume J, Table E and Volume H, Table E);
- b. LR-I-174;
- c. LR-I-91A and B;
- d. LR-I-162A;
- e. LR-I-137;
- f. LR-I-147;
- g. LR-I-146;
- h. LR-I-160A;
- i. LR-I-160L;
- j. LR-I-168;
- k. Tr. 21/9420-21;
- l. Tr. 21/8909-10; and
- m. Response of USPS Witness Mayes to POIR No. 1, Question 4 at 1 (Revised 4/21/00)

RESPONSE:

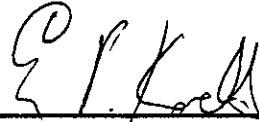
For purposes of responding to this request, the phrase "does not intend to file" is interpreted to mean "currently does not intend to file." Also, please be aware that to the extent that any of the material submitted as part of the update exercise shows cost coverages that result when updated revenue forecasts are compared with updated cost forecasts, those cost coverages are merely mechanical outputs from the process, and in no way reflect any attempt on the part of the Postal Service to apply the pricing criteria of the Act to the updated data.

- a. Not confirmed. See LR-I-424.
- b. Not confirmed. An update of most of the material filed in LR-I-174 is included in the Excel electronic version of the attachments to the Response to POIR No. 16, filed on July 27, 2000, and available on the Commission's webpage.

- c. With respect to LR-I-91A, not confirmed. Portions of that material (without piggybacks) were updated. With respect to LR-I-91B, confirmed.
- d. Confirmed.
- e. Not confirmed. A portion of LR-I-137 has been updated in LR-I-428. Confirmed that for those portions that are not updated in LR-I-428, there currently are no plans to update such material.
- f. Confirmed.
- g. Confirmed.
- h. Confirmed.
- i. Confirmed.
- j. Not confirmed. See LR-I-436.
- k. Not confirmed. See the updated PRC version library references.
- l. With respect to Tr. 21/8909, the request is not clear. It can be confirmed that LR-I-235, which is cited on that page, has not been updated. With respect to Tr. 21/8910, not confirmed, because it would appear that all of the material necessary has been provided, either within the updated PRC version library references (costs), or within the Response to POIR NO. 16 (revenues).
- m. Not confirmed. See Response to POIR No. 16, filed on July 27th.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "E. P. Koetting", is written over a horizontal line.

Eric P. Koetting

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